

**GOLDBERG
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November 13, 2023

VIA ECF

Hon. Paul A. Engelmayer, U.S.D.J.
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Case No.: 1:19-cv-10371 – Vasquez, et al. v. Mobileshack Inc., et al.

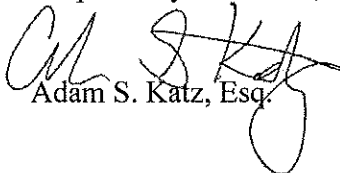
Dear Judge Engelmayer:

This firm represents defendants Avi Levy and MobileShack Inc. (collectively, "Defendants") in the above-referenced matter. As the Court may recall, on November 1, 2023, the Court ordered the parties to submit a signed settlement agreement in this matter by November 15, 2023. (ECF Dkt. No. 176.) The parties have worked diligently to finalize the settlement agreement and its terms, but we will be unable to submit a signed settlement agreement to the Court by November 15, 2023. The primary reason is that since we last wrote, it has taken time to negotiate the payment terms of the agreement and we need to ensure that translations into Spanish are properly provided to Plaintiffs. Based on the foregoing, we write, jointly with Plaintiffs, to ask the Court for an additional two weeks to submit the signed the settlement agreement to the Court. If this request is granted, the parties would submit the signed settlement agreement by November 30, 2023.

This is the first request for an extension of time to file the settlement agreement with the Court.


We thank the Court for its attention to this matter.

Respectfully submitted,


Adam S. Katz, Esq.

AK:sd

Granted. SO ORDERED.


PAUL A. ENGELMAYER
United States District Judge

Dated: November 13, 2023
New York, New York

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